FILED
JAN 25 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES OF AMERICA

SOUTHERN DISTRICT OF CALIFORNIA '08 MJ 8064

UNITED STATES OF AMERICA, Plaintiff, v. Juan Antonio TORRES-Lopez Defendant.	MAGISTRATE CASE NO.: COMPLAINT FOR VIOLATION OF: Title 8, United States Code, Section 1324(a)(2)(B)(ii) Bringing in Illegal Aliens for Financial Gain

On or about January 24, 2008, within the Southern District of California, defendant Juan Antonio TORRES-Lopez, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, Blanca MONTERO-Plancarte and Elda Patricia CANALES-Santibanez, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

And the complainant states that this complaint is based on the attached Statement of Facts which, is incorporated herein by reference.

LETICIAL CASILLAS
CBP Criminal Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 25TH DAY OF JANUARY 2008.

PETER C. LEWIS
U. S. MAGISTRATE JUDGE

UNITED STATES OF AMERICA
v.
Juan Antonio TORRES-Lopez

STATEMENT OF FACTS

The complainant states that this complaint is based upon the reports of the apprehending officers and the investigation conducted by United States Customs & Border Protection Enforcement Officer Leticia Casillas.

On January 24, 2008, at approximately 2:13 A.M., Juan Antonio TORRES-Lopez arrived at the Calexico, California, West Port of Entry, as the driver of a 1993 Toyota Tracel.

During primary inspection, TORRES gave a negative Customs declaration to U. S. Border Protection Officer (CBPO) E. Hernandez. CBPO Hernandez asked TORRES where he was going. TORRES responded to work in the fields. CBPO Hernandez asked TORRES to step out of the vehicle and open the trunk. CBPO Hernandez noticed TORRES began to look around and fumble with his keys as he opened the trunk. TORRES stepped back as CBPO Hernandez was going towards the trunk. CBPO Hernandez saw TORRES begin to run. CBPO Hernandez proceeded to run after TORRES and instructed him to stop. CBPO Hernandez caught up to TORRES and TORRES continued to struggle to get away. CBPO Hurtado arrived and assisted CBPO Hernandez in arresting TORRES. TORRES was escorted to the vehicle secondary office.

Records show TORRES is a native and citizen of the Mexico with numerous apprehension for being an imposter and driver of vehicles with imposters or undocumented aliens.

CBPO Hernandez was notified there were two undocumented females concealed in the trunk of the vehicle driven by TORRES. Both females, Blanca MONTERO-Plancarte and Elda Patricia CANALES-Santibanez, were removed from the trunk of the vehicle.

Material Witness MONTERO stated she is a native and citizen of Mexico with no legal documents to enter, reside or pass through the United States. MONTERO stated she met a female in a park in Mexicali, Baja California, Mexico, who told her, she would help her gain entry into the United States. MONTERO claims she waited in the park for about thirty minutes and then the female placed her in the trunk of a car. Ten minutes later, another female was placed in the trunk with her. MONTERO stated when they closed the trunk, it cut her on her forehead causing her to bleed. MONTERO claimed she was in the trunk of the vehicle for approximately forty-five minutes before being discovered. MONTERO stated she was going to pay the smuggler approximately $4,000.00 to be smuggled into the United Stated.

Material Witness CANALES stated she is a native and citizen of Mexico with no legal entry documents to enter, reside or pass through the United States. CANALES stated she made the smuggling arrangements with an unknown female in Mexicali to be smuggled into the United States illegally. CANALES stated she was going to be charged $3,000.00 to be smuggled into the United States. CANALES stated she was at a park in Mexicali with an unknown female smuggler, when a an unknown male arrived and told her and the other female, MONTERO, to get in the trunk.

Material Witness:

Name	Country of Birth
Blanca MONTERO Plancarte	MEXICO
Patricia CANALES Santibanez	MEXICO

Further, the complainant states that she believes said aliens are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.